

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
Franklin Telephone Company, Inc.)	
Inter-Community Telephone Company, LLC)	
North Central Telephone Cooperative, Inc.)	
Petitions for Waiver)	

Comments of TCA

I. Introduction

TCA, Inc. - Telcom Consulting Associates (“TCA”) hereby submits these comments in response to the Public Notice issued in the proceedings as captioned above.

TCA fully supports the Petitions of Franklin Telephone Company, Inc., Inter-Community Telephone Company, LLC, and North Central Telephone Cooperative, Inc. (the “Petitioners”) in seeking a waiver or extension of the Commission’s rules regarding local number portability (“LNP”).¹ Further, TCA respectfully requests that the Commission provide the same relief as sought by the Petitioners to all rural telephone companies, as defined by the Communications Act of 1934, as amended.² The current environment of regulatory uncertainty and implementation difficulties described by the Petitioners is one shared by all rural telephone companies.

TCA is a management consulting firm, providing financial, regulatory, and marketing services for over seventy small, rural local exchange carriers (“LECs”) throughout the United

¹ 47 C.F.R. § 52.23(c)

² 47 U.S.C. §153(37). A rural telephone company is defined by the Act as providing telephone exchange service, including exchange access, to fewer than 50,000 access lines and serving a study area of fewer than 100,000 access lines. See 47 U.S.C. §§153(37)(B) and (C).

States. TCA's clients will be directly impacted by the FCC's actions in this proceeding. These comments address the concerns of TCA's clients.

II. The factual circumstances surrounding the LNP requests described by Petitioners are easily applicable to majority of rural carriers.

The Petitioners describe requests for LNP from two wireless carriers, Verizon Wireless and Sprint PCS, which do not reach the standards set by the Commission for a *bona fide* request for LNP.³ Namely, the requests fail to designate a discrete geographic area for which LNP is being sought, and seemingly seek location portability, instead of limiting LNP to service provider portability. TCA's clients, like the Petitioners and, in all probability, most rural local exchange carriers ("RLECs"), have also received requests for LNP from many of the large wireless carriers. Like the Petitioners, the LNP requests received by TCA's clients are often lacking a designation of a specific geographic area. Instead, the complete listing of Metropolitan Statistical Areas and Rural Service Areas ("MSAs" and "RSAs") is attached, leaving it to the RLEC to fathom where LNP is being requested.

In a generic letter dated February 21, 2003 (Attachment A), T-Mobile requested LNP from a TCA client. The one-paragraph letter attached a listing of all MSAs and RSAs, entitled the "Bona Fide Request Form." The letter asked TCA's client to complete the form "where indicated."⁴ The form states "[s]pecifically, T-Mobile requests that ALL codes be opened for portability within the Metropolitan Statistical Areas designated below."⁵ As the form was otherwise blank, all that may be reasonably assumed, therefore, is that T-Mobile is requesting LNP from TCA's client for *all* MSAs and RSAs in the country.

³ See In the Matter of Telephone Number Portability, *Franklin Telephone Company, Inc. Petition for Waiver of Section 52.23(c) of the Commission's Rules*, CC Docket No. 95-116, filed September 25, 2003, pp. 4-5 (Franklin Petition), See also In the Matter of Telephone Number Portability, *Inter-Community Telephone Company, LLC, Petition for Waiver of Section 52.23(c) of the Commission's Rules*, CC Docket No. 95-116, filed September 25, 2003, pp. 3-4 and In the Matter of Telephone Number Portability, *North Central Telephone Cooperative, Inc. Petition for Waiver of Section 52.23(c) of the Commission's Rules*, CC Docket No. 95-116, filed September 25, 2003, pp. 4-5.

⁴ See Attachment A, p.1.

⁵ Attachment A, p. 2 (emphasis in original).

Like the Petitioners, the LNP requests from wireless carriers received by TCA's clients apparently attempt to gain location portability. By submitting vague LNP requests with no evidence that the ported number(s) will be retained "at the same location"⁶ within the assigned rate center, the wireless carriers are attempting an end-run around the Commission in order to gain location portability.

The wireless industry is well aware that the Commission is currently considering the issue of wireline-wireless porting where the wireless carrier does not have a presence in the rate center where the customer is physically located. In a July 3, 2003 letter addressed to both Verizon Wireless and Cellular Telecommunications & Internet Association (CTIA), a trade association of the wireless industry, John Muleta, Chief of the Commission's Wireless Telecommunications Bureau stated that this issue remained under consideration by the Commission.⁷ Mr. Muleta unequivocally states that the issue of location portability between wireline and wireless carriers is under consideration and "[w]ithout addressing this limited issue on its merits, we emphasize that porting between wireline and wireless carriers is required in *other cases*."⁸

CTIA, on behalf of the wireless industry, continues to urge the Commission to allow this change in regulatory policy. In an *ex parte* presentation to the Commission on October 14, 2003, CTIA urged that "full and competitive intermodal porting [should] occur simultaneously with wireless-wireless porting implementation on November 24, 2003..."⁹ As evidence that both service provider and location portability are achievable between a wireline and wireless carrier, CTIA points to a porting agreement between Verizon Communications and Verizon Wireless: "For example, Verizon has signaled that a full portability is technically feasible by signing an intermodal porting agreement with Verizon Wireless."¹⁰ However, that agreement only allows

⁶ 47 U.S.C. § 153 (30) (defining number portability).

⁷ See Letter to John T. Scott, III, Vice President & Deputy General Counsel, Verizon Wireless and Michael F. Altschul, Senior Vice President, General Counsel, Cellular Telecommunications & Internet Association, DA 03-2190, CC Docket No. 95-116, dated July 3, 2003, p. 4 ("Muleta letter").

⁸ *Id.* (emphasis added).

⁹ See Letter to Marlene Dortch, Secretary, Federal Communications Commission, from Diane Cornell, Vice President for Regulatory Policy, Cellular Telecommunications & Internet Association, *Ex Parte* Presentation, CC Docket No. 95-116, dated October 15, 2003, p. 1 ("CTIA October *ex parte*").

¹⁰ CTIA October *ex parte*, p. 2.

porting in areas where both carriers provide service. USA Today reports that Verizon Communications will port “landline numbers to a Verizon Wireless cellphone anywhere *both* provide service.”¹¹ While it is difficult to discern the details of this intra-company agreement, it is equally difficult to imagine Verizon Communications voluntarily agreeing to port out a number associated with a rate center different from the customer’s physical location. Both Verizon Communications and Verizon Wireless, in an *ex parte* presentation made to the Commission on August 20, 2003, stated that, while there is nothing in the existing rules limiting such number portability, such a porting arrangement would “cause a lack of symmetry, which is inconsistent with the goals of number portability.”¹² Verizon jointly continued by stating that:

[t]he existing rules do not require a LEC to port *in* a wireless number that is associated with a rate center different from the customer’s physical location.

Porting in these numbers would cause calls that are physically local to be rated as toll.¹³

Certainly, if porting in a number could cause these problems, numbers ported out of rate centers would be subject to the same rating problems.

As these LNP requests, both described above and by the Petitioners, are of a generic nature¹⁴, the Commission may reasonably assume that the majority of rural carriers in the nation have received similar, if not the same, requests. The Commission should reject this obvious attempt by the wireless industry to mold regulations to their benefit, by granting the waiver sought by the Petitioners and extending that waiver to rural telephone companies.

¹¹ “New Rule Rattles Cellphone Industry,” USA Today, October 17, 2003, p. 2B (emphasis added).

¹² See Letter to Marlene Dortch, Secretary, Federal Communications Commission, from Marie Breslin, Assistance Vice President, Federal Regulatory Advocacy, Verizon Communications, *Ex Parte* Presentation, CC Docket No. 95-116, dated August 21, 2003, Attachment entitled “Verizon Wireless Number Portability Issues” (“Joint Verizon *ex parte*”).

¹³ *Id.*, (emphasis added).

¹⁴ T-Mobile’s letter, like Sprint PCS’ requests referenced by the Petitioners, was addressed “To Whom It May Concern.” Attachment A, p.1.

III. The standard for waiver of Commission rules, met by the Petitioners, is effortlessly met by the majority of rural carriers.

As the Petitioners note, “[a]pplication of the requirement to implement number portability by the WLNP Deadline would impose a requirement that is unduly economically burdensome.”¹⁵ TCA respectfully submits that application of the LNP rules, in light of the current regulatory uncertainty, would impose an unreasonable economic burden on all rural carriers and their customers. On average, rural carriers serve approximately 13 customers per square mile and 1,200 customers per switch.¹⁶ From the instant Petitions, the Commission can gage the cost of upgrading equipment faced by most RLECs. The Commission must also consider the ongoing costs of providing LNP. These continuing costs would be spread across a small customer base, with little (if any) consumer benefit.

The economic burden becomes even more unreasonable when the current regulatory uncertainty is considered. As noted above, the Commission is currently considering significant issues regarding wireline-wireless implementation. It cannot be expected that RLECs and their customers should incur what could be, dependent on the ultimate outcome, needless costs. Even with an Order issued by the Commission before the deadline, regulatory certainty in this thorny issue is not easily obtained. The Commission is well aware of the long standing and, at times, vehement opposition of the wireless industry to LNP. As late as September 23, 2003, CTIA acknowledged its “deep misgivings about the comparative costs and benefits of wireless LNP.”¹⁷ Subjecting RLECs and their customers to a heavy economic burden in light of regulatory uncertainty is unreasonable. By granting the waiver sought by the Petitioners and extending it to all rural telephone companies, the Commission could mitigate the burden otherwise imposed.

IV. Conclusion

The Petitioners have well proven that they deserve of a waiver of the LNP rules. Indeed, the circumstances that the Petitioners find themselves in are not unique but easily discovered to

¹⁵ Franklin Petition, p. 6.

¹⁶ *The Rural Difference*, Rural Task Force, White Paper 2, January 2000, <http://www.wutc.wa.gov/rtf/rtfpub.nsf/> pp. 8 and 11.

¹⁷ See Letter to Marlene Dortch, Secretary, Federal Communications Commission, from Michael F. Altschul, Senior Vice President, General Counsel, Cellular Telecommunications & Internet Association, CC Docket No. 95-116, dated September 23, 2003, p. 4.

affect all rural carriers. The Commission should grant the Petitioners' requests and exempt *all* rural telephone companies from the LNP rules until regulatory certainty in this issue is achieved.

Respectfully submitted,

[electronically filed]

TCA, Inc.-Telcom Consulting Associates
1465 Kelly Johnson Blvd., Suite 200
Colorado Springs, CO 80920
(719) 266-4334

October 17, 2003

ATTACHMENT A



12920 SE 38th Street, Bellevue, WA 98006

February 21, 2003

To Whom It May Concern:

Enclosed please find T-Mobile USA, Inc.'s ("T-Mobile") Bona Fide Request ("BFR") Form for local number portability as required by the Federal Communications Commission in CC Docket 95-116. Please fill out the form where indicated and return a copy to T-Mobile by March 7, 2003. Once the completed BFR is returned, T-Mobile will begin negotiations on the local number portability operations agreements.

Please contact me if you have any further issues regarding this request.

Sincerely,

Shannon Reilly
Corporate Counsel – Regulatory Affairs
(425) 378-5178
shannon.reilly@t-mobile.com

Enclosure



BONA FIDE REQUEST FORM (BFR)

T-Mobile USA, Inc. ("T-Mobile") requests deployment of long-term Local Number Portability as defined in the FCC mandates (CC Docket 95-116). Specifically, T-Mobile requests that ALL codes be opened for portability within the Metropolitan Statistical Areas designated below.

Actions required of the Recipient:

1. Within 10 days of receipt, provide confirmation to T-Mobile that this form has been received.
2. For all currently released code, and those to be released at any future time, within the areas requested below, open all for porting in the LERG.
3. For all currently released code, and those to be released at any future time, within the areas requested below, open all for porting in the NPAC (Number Portability Administration Center).
4. Ensure that all switches handling codes with the designated MSAs are Local Number Portability Capable.

TO: _____
Contact Name: _____
Address: _____

Email: _____
Fax: _____
Phone: _____

FROM: T-Mobile USA, Inc.
Contact Name: Shannon Reilly
Address: 12920 SE 38th St.
Bellevue, WA 98006
Email: shannon.reilly@T-Mobile.com
Fax: 425-378-4840
Phone: 425-378-5178

Date of Request: February 24, 2003
Confirmation Due: March 7, 2003
Effective Date: November 24, 2003

Designated Metropolitan Statistical Areas (MSAs) to be Opened for Porting November 24, 2003:				
MSA Number	MSA Name	State	Date LNP Capable	CLLI Code of Switch Serving MSA
1	New York--Northern New Jersey--Long Island	NY,NJ,CT, PA		
2	Los Angeles--Riverside--Orange County	CA		
3	Chicago--Gary--Kenosha	IL,IN,WI,WV		
4	Washington--Baltimore	DC,MD,VA,WV		
5	San Francisco--Oakland--San Jose	CA		
6	Philadelphia--Wilmington--Atlantic City	PA,NJ,DE,MD		
7	Boston--Worcester--Lawrence	MA,NH,ME,CT		
8	Detroit--Ann Arbor--Flint	MI		
9	Dallas--Fort Worth	TX		
10	Houston--Galveston--Brazoria	TX		
11	Atlanta	GA		
12	Miami--Fort Lauderdale	FL		
13	Seattle--Tacoma--Bremerton	WA		
14	Phoenix--Mesa	AZ		
15	Minneapolis--St. Paul	MN,WI		
16	Cleveland--Akron	OH		

17	San Diego	CA		
18	St. Louis	MO		
19	Denver--Boulder--Greeley	CO		
20	San Juan--Caguas--Arecibo	PR		
21	Tampa--St. Petersburg--Clearwater	FL		
22	Pittsburgh	PA,NJ,DE,MD		
23	Portland--Salem	OR,WA		
24	Cincinnati--Hamilton	OH,KY,IN		
25	Sacramento--Yolo	CA		
26	Kansas City	MO,KS		
27	Milwaukee--Racine	WI		
28	Orlando	FL		
29	Indianapolis	IN		
30	San Antonio	TX		
31	Norfolk--Virginia Beach--Newport News	VA,NC		
32	Las Vegas	NV,AZ		
33	Columbus	OH		
34	Charlotte--Gastonia--Rock Hill	NC,SC		
35	New Orleans	LA		
36	Salt Lake City--Ogden	UT		
37	Greensboro--Winston-Salem--High Point	NC,SC		
38	Austin--San Marcos	TX		
39	Nashville	TN		
40	Providence--Fall River--Warwick	RI,MA		
41	Raleigh--Durham--Chapel Hill	NC		
42	Hartford	CT		
43	Buffalo--Niagara Falls	NY		
44	Memphis	TN,AR,MS		
45	West Palm Beach--Boca Raton	FL		
46	Jacksonville	FL		
47	Rochester	NY		
48	Grand Rapids--Muskegon--Holland	MI		
49	Oklahoma City	OK		
50	Louisville	KY,IN		
51	Richmond--Petersburg	VA,NC		
52	Greenville--Spartanburg--Anderson	SC		
53	Dayton--Springfield	OH		
54	Fresno	CA		
55	Birmingham	AL		
56	Honolulu	HI		
57	Albany--Schenectady--Troy	NY		
58	Tucson	AZ		
59	Tulsa	OK		
60	Syracuse	NY		
61	Omaha	NE,IA		
62	Albuquerque	NM		
63	Knoxville	TN		

64	El Paso	TX		
65	Bakersfield	CA		
66	Allentown--Bethlehem--Easton	PA		
67	Harrisburg--Lebanon--Carlisle	PA		
68	Scranton--Wilkes-Barre--Hazleton	PA		
69	Toledo	OH		
70	Baton Rouge	LA		
71	Youngstown--Warren	OH		
72	Springfield	MA,NH,ME,CT		
73	Sarasota--Bradenton	FL		
74	Little Rock--North Little Rock	AR		
75	McAllen--Edinburg--Mission	TX		
76	Stockton--Lodi	CA		
77	Charleston--North Charleston	SC		
78	Wichita	KS		
79	Mobile	AL		
80	Columbia	SC		
81	Colorado Springs	CO		
82	Fort Wayne	IN		
83	Daytona Beach	FL		
84	Lakeland--Winter Haven	FL		
85	Johnson City--Kingsport--Bristol	TN		
86	Lexington	KY,IN		
87	Augusta--Aiken	GA,SC		
88	Melbourne--Titusville--Palm Bay	FL		
89	Lancaster	PA		
90	Chattanooga	TN,GA		
91	Des Moines	IA		
92	Kalamazoo--Battle Creek	MI		
93	Lansing--East Lansing	MI		
94	Modesto	CA		
95	Fort Myers--Cape Coral	FL		
96	Jackson	MS		
97	Boise City	ID		
98	Madison	WI		
99	Spokane	WA		
100	Pensacola	FL		

Designated Metropolitan Statistical Areas (MSAs) to be Opened for Porting May 24, 2004:

MSA NAME	State	Date LNP Capable	CLLI Code of Switch Serving MSA	MSA NAME	State	Date LNP Capable	CLLI Code of Switch Serving MSA
Bethel	AK			Garfield	CO		
Anniston	AL			Kiowa	CO		
Cleburne	AL			Logan	CO		
Dothan	AL			Moffat	CO		
Florence	AL			Park	CO		
Franklin	AL			Pueblo	CO		
Gadsden	AL			Saguache	CO		
Huntsville	AL			San Miguel	CO		
Jackson	AL			Bridgeport	CT		
Lee	AL			New Haven	CT		
Montgomery	AL			Windham	CT		
Tuscaloosa	AL			Kent	DE		
Washington	AL			Calhoun	FL		
Clay	AR			Citrus	FL		
Cross	AR			Collier	FL		
Hempstead	AR			Dixie	FL		
Ouachita	AR			Fort Walton Beach	FL		
Polk	AR			Gainesville	FL		
Coconino	AZ			Glades	FL		
Gila	AZ			Hamilton	FL		
Graham	AZ			Hardee	FL		
Mohave	AZ			Jefferson	FL		
Navajo	AZ			Lakeland	FL		
Yuma	AZ			Monroe	FL		
Alpine	CA			Ocala	FL		
Chico	CA			Panama City	FL		
Del Norte	CA			Putnam	FL		
Imperial	CA			Tallahassee	FL		
Kings	CA			W. Palm Beach	FL		
Madera	CA			Walton	FL		
Mendocino	CA			Albany	GA		
Modoc	CA			Athens	GA		
Mono	CA			Bleckley	GA		
Oxnard	CA			Chattooga	GA		
Redding	CA			Columbus	GA		
Salinas	CA			Dawson	GA		
San Luis Obispo	CA			Early	GA		
Santa Barbara	CA			Hancock	GA		
Santa Cruz	CA			Heralson	GA		
Sierra	CA			Jasper	GA		
Tehama	CA			Liberty	GA		
Vallejo	CA			Macon	GA		
Yuba City	CA			Marion	GA		

Costilla	CO			Savannah	GA		
Elbert	CO			Spalding	GA		
Fort Collins, Lovind	CO			Toombs	GA		
Warren	GA			Kosciusko	IN		
Whitfield	GA			Lafayette	IN		
Worth	GA			Miami	IN		
Hawaii	HI			Muncie	IN		
Kauai	HI			Newton	IN		
Maul	HI			Owen	IN		
Audubon	IA			Randolph	IN		
Cedar Rapids	IA			South Bend	IN		
Dubuque	IA			Terre Haute	IN		
Humboldt	IA			Warren	IN		
Ida	IA			Brown	KS		
Iowa City	IA			Elk	KS		
Jackson	IA			Franklin	KS		
Lyon	IA			Lawrence	KS		
Mills	IA			Topeka	KS		
Monona	IA			Clay	KY		
Muscatine	IA			Fulton	KY		
Union	IA			Mason	KY		
Winneshlek	IA			Owensboro	KY		
Davenport	IA, IL			Powell	KY		
Sioux City	IA, NE			Trimble	KY		
Boundary	ID			Union	KY		
Boundary	ID			Alexandria	LA		
Butte	ID			Beauregard	LA		
Clark	ID			Caldwell	LA		
Elmore	ID			Claiborne	LA		
Idaho	ID			De Soto	LA		
Lemhi	ID			Iberville	LA		
Adams	IL			Lafayette	LA		
Bureau	IL			Lake Charles	LA		
Clay	IL			Monroe	LA		
Decatur	IL			Morehouse	LA		
Jo Davless	IL			Plaquemines	LA		
Joliet	IL			Shreveport	LA		
Kankakee	IL			St. James	LA		
Mason	IL			West Feliciana	LA		
Mercer	IL			Barnstable	MA		
Montgomery	IL			New Bedford	MA		
Peoria	IL			Pittsfield	MA		
Rockford	IL			Frederick	MD		
Springfield	IL			Kent	MD		
Vermilion	IL			Oxford	ME		
Washington	IL			Portland	ME		
Anderson	IN			Alger	MI		
Bloomington	IN			Benton Harbor	MI		

Brown	IN			Cass	MI		
Decatur	IN			Cheboygan	MI		
Evansville	IN			Gogebic	MI		
Huntington	IN			Muskegon	MI		
Kokomo	IN			Newaygo	MI		
Roscommon	MI			Northampton	NC		
Tuscola	MI			Pitt	NC		
Duluth	MN			Yancey	NC		
Goodhue	MN			Barnes	ND		
Lake	MN			Bismarck	ND		
Barton	MO			Bottineau	ND		
Bates	MO			Divide	ND		
Benton	MO			Grand Forks	ND		
Callaway	MO			Kidder	ND		
De Kalb	MO			McKenzie	ND		
Harrison	MO			Carroll	NH		
Joplin	MO			Coos	NH		
Linn	MO			Atlantic City	NJ		
Maries	MO			Hunterdon	NJ		
Moniteau	MO			Long Branch	NJ		
Perry	MO			New Brunswick	NJ		
Saline	MO			Ocean	NJ		
Shannon	MO			Sussex	NJ		
St. Joseph	MO			Trenton	NJ		
Stoddard	MO			Catron	NM		
Benton	MS			Colfax	NM		
Biloxi, Gulfport	MS			Grant	NM		
Bolivar	MS			Las Cruces	NM		
Claiborne	MS			Lincoln	NM		
Copiah	MS			San Juan	NM		
Lamar	MS			Santa Fe	NM		
Montgomery	MS			Humboldt	NV		
Pascagoula	MS			Lander	NV		
Tunica	MS			Mineral	NV		
Yalobusha	MS			Reno	NV		
Beaverhead	MS			Storey	NV		
Billings	MT			White Pine	NV		
Carbon	MT			Binghamton	NY		
Daniels	MT			Chautauqua	NY		
Deer Lodge	MT			Columbia	NY		
Fergus	MT			Elmira	NY		
Great Falls	MT			Franklin	NY		
Lincoln	MT			Glens Falls	NY		
Mineral	MT			Jefferson	NY		
Prairie	MT			Orange County	NY		
Toole	MT			Otsego	NY		
Anson	NC			Poughkeepsie	NY		
Asheville	NC			Yates	NY		

Burlington	NC		Ashtabula	OH	
Cabarrus	NC		Canton	OH	
Camden	NC		Clinton	OH	
Cherokee	NC		Dayton	OH	
Fayetteville	NC		Hancock	OH	
Henderson	NC		Lima	OH	
Hickory	NC		Mansfield	OH	
Mercer	OH		Laurens	SC	
Morrow	OH		Oconee	SC	
Ross	OH		Corson	SD	
Sandusky	OH		Custer	SD	
Williams	OH		Haakon	SD	
Cimarron	OK		Hanson	SD	
Enid	OK		Harding	SD	
Garvin	OK		Kingsbury	SD	
Grant	OK		McPherson	SD	
Harper	OK		Rapid City	SD	
Haskell	OK		Sioux Falls	SD	
Jackson	OK		Sully	SD	
Lawton	OK		Bledsoe	TN	
Nowata	OK		Cannon	TN	
Clatsop	OR		Fayette	TN	
Coos	OR		Giles	TN	
Crook	OR		Hamblen	TN	
Eugene, Springfield	OR		Lake	TN	
Hood River	OR		Macon	TN	
Lincoln	OR		Maury	TN	
Medford	OR		Clarksville	TN, KY	
Umatilla	OR		Abilene	TX	
Altoona	PA		Amarillo	TX	
Bedford	PA		Atascosa	TX	
Bradford	PA		Beaumont	TX	
Crawford	PA		Briscoe	TX	
Erie	PA		Brownsville	TX	
Greene	PA		Burleson	TX	
Huntington	PA		Chambers	TX	
Jefferson	PA		Cherokee	TX	
Johnstown	PA		Concho	TX	
McKean	PA		Corpus Christi	TX	
Northeast	PA		Dallam	TX	
Potter	PA		Edwards	TX	
Reading	PA		Fannin	TX	
Sharon	PA		Gaines	TX	
State College	PA		Galveston	TX	
Union	PA		Hansford	TX	
Williamsport	PA		Hardeman	TX	
York	PA		Hudspeth	TX	

Newport	RI		Jack	TX	
Calhoun	SC		Killeen, Temple	TX	
Cherokee	SC		Laredo	TX	
Chesterfield	SC		Longview, Marsall	TX	
Clarendon	SC		Loving	TX	
Florence	SC		Lubbock	TX	
Georgetown	SC		Midland	TX	
Hampton	SC		Navarro	TX	
Lancaster	SC		Newton	TX	
Odessa	TX		La Crosse	WI	
Parmer	TX		Marinette	WI	
Reeves	TX		Pierce	WI	
Runnels	TX		Sheboygan	WI	
San Angelo	TX		Trempealeau	WI	
Sherman, Denison	TX		Vernon	WI	
Texarkana	TX		Vilas	WI	
Tyler	TX		Wausau	WI	
Victoria	TX		Wood	WI	
Waco	TX		Grant	WY	
Wichita Falls	TX		Mason	WY	
Wilson	TX		Wetzel	WY	
Beaver	UT		Casper	WY	
Box Elder	UT		Converse	WY	
Carbon	UT		Lincoln	WY	
Juab	UT		Niobrara	WY	
Morgan	UT		Park	WY	
Piute	UT		Sheridan	WY	
Amelia	VA		Santa Rosa, Petaluma	CA	
Bath	VA		Visalia, Tulare	CA	
Bedford	VA		New London	CT	
Buckingham	VA		Waterloo, Cedar Falls	IA	
Caroline	VA		Aurora, Elgin	IL	
Danville	VA		Bloomington, Normal	IL	
Frederick	VA		Champaign, Urbana	IL	
Giles	VA		Elkhart, Goshen	IN	
Greensville	VA		Houma, Thibodaux	LA	
Highland	VA		Lewiston, Auburn	ME	
Lee	VA		Saginaw, Bay, Midland	MI	
Madison	VA		Fargo, Moorhead	ND, MN	
Roanoke	VA		Manchester, Nashua	NH	
Tazewell	VA		Vineland, Millville	NJ	
Addison	VT		Utica, Rome	NY	
Burlington	VT		Lorain, Elyria	OH	

Franklin	VT			Staubenville, Weirton	OH		
Bellingham	WA			Bryan, College St	TX		
Bremerton	WA			Provo, Orem	UT		
Clallam	WA			Richland, Kennewick	WA		
Ferry	WA			Janesville, Beloit	WI		
Grays Harbor	WA			Appleton	WI		
Kittitas	WA			Columbia	WI		
Okanogan	WA			Door	WI		
Olympia	WA			Green Bay	WI		
Whitman	WA			Kenosha	WI		
Yakima	WA						